

ESTTA Tracking number: **ESTTA48959**

Filing date: **10/17/2005**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91166497
Party	Defendant Identity Theft Guard Solutions, LLC Identity Theft Guard Solutions, LLC Suite 130 8050 SW Warm Springs Street Tualatin, OR 97062
Correspondence Address	Troy D. Greenfield Bullivant Houser Bailey PC Suite 2300 1601 Fifth Avenue Seattle, WA 98101-1618
Submission	Answer
Filer's Name	Troy Greenfield
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Signature	/TG/
Date	10/17/2005
Attachments	identitysafeguardsanswer.pdf (2 pages)

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7 IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
8 BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

9 INTERSECTIONS INC.,

10 Opposer,

11 v.

12 IDENTITY THEFT GUARD SOLUTIONS,
13 LLC,

14 Applicant.

Opposition No.: 91166497
Serial No. 78286737

ANSWER

15 In answer to Opposer's Notice of Opposition, Applicant Identity Theft Guard
16 Solutions, LLC (hereinafter referred to as "Applicant") denies Opposer would be damaged
17 by registration of the mark shown in U.S. Trademark Application Serial No. 78286737 and
18 otherwise admits, denies and alleges as follows:

19 Applicant lacks sufficient knowledge or information to admit or deny the allegation
20 concerning Opposer's state of incorporation, address and subjective belief concerning
21 registration of the mark shown in U.S. Trademark Application Serial No. 78286737 and,
22 therefore, must deny the same.

23 1. Applicant lacks sufficient knowledge or information to admit or deny the
24 allegations concerning Opposer's alleged goods and services and, therefore, must deny the
25 same.
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2. Based on information and belief, and as reflected in the Trademark Applications and Registrations Retrieval (TARR), Applicant admits the allegations contained in paragraph 2.

3. Applicant lacks sufficient knowledge or information to admit or deny the allegations contained in paragraph 3 and, therefore, must deny the same.

4. As Applicant lacks sufficient knowledge or information to form a belief as to the truth of the allegations concerning Opposer's alleged use of IDENTITY GUARD, it follows Applicant lacks sufficient knowledge or information to admit or deny the allegations contained in paragraph 4 and, therefore, must deny the same.

5. Denied.

6. Denied.

7. Denied.

8. Denied.

9. Except as expressly admitted above, Applicant denies the remaining allegations contained in Opposer's Notice of Opposition and the whole thereof.

Discovery and investigation have just begun and, therefore, Applicant respectfully reserves the right to assert appropriate affirmative defenses.

WHEREFORE, having fully answered Opposer's Notice of Opposition, Applicant prays that the opposition be denied in favor of Applicant and that Trademark Application Serial No. 78286737 proceed toward registration.

Respectfully submitted,

Date: 10/17/05

By Troy D. Greenfield

Troy D. Greenfield
Attorneys for Identity Theft Guard Solutions